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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

United States of America,

Plaintiff,

v.

Case: 2:22-cr-20231

Judge: Hood, Denise Page

MJ: Grand, David R.

Filed: 04-28-2022 At 02:31 PM

USA V TIMOTHY GAVIN (SS)

Violations: 21 U.S.C. §§ 846,  
841(a)(1), and (b)(1)(B)(ii)(II)

Timothy Gavin,

Defendant.

\_\_\_\_\_ /

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

*21 U.S.C. §§ 846, 841(a)(1), and (b)(1)(B)(ii)(II) –  
Attempted possession with intent to distribute a  
controlled substance (cocaine)*

On or about September 24, 2020, in the Eastern District of Michigan,  
Southern Division, the defendant, TIMOTHY GAVIN, did knowingly and  
unlawfully attempt to possess with intent to distribute a substance containing at  
least 500 grams or more of a mixture and substance containing a detectable amount

of cocaine, a Schedule II controlled substance; all in violation of Title 21, United States Code, Sections 846, 841(a)(1), and (b)(1)(B)(ii)(II).

**FORFEITURE ALLEGATION**

*18 U.S.C. § 924(d), 21 U.S.C. § 853(a), and 28 U.S.C. § 2461*

The above allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853(a), and 28 U.S.C. § 2461.

Upon conviction of the controlled offense set forth above in Count One of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations.

If any of the property described above, as a result of any act or omission of the defendant—

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeit other property of defendant up to the value of the above described forfeitable property, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL

*s/ Grand Jury Foreperson*  
GRAND JURY FOREPERSON

DAWN N. ISON  
United States Attorney

*s/ Brandy R. McMillion*  
BRANDY R. MCMILLION  
Chief, General Crimes Unit  
Assistant United States Attorney

*/s Erin L. Ramamurthy*  
ERIN L. RAMAMURTHY  
Assistant United States Attorney

Dated: April 27, 2022

United States District Court  
Eastern District of Michigan

**Criminal Case Cover Sheet**

Case: 2:22-cr-20231  
Judge: Hood, Denise Page  
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USA V TIMOTHY GAVIN (SS)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete the following information.

<b>Companion Case Information</b>		Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :		Judge Assigned:
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	AUSA's Initials: <u>ELR</u>

Case Title: USA v. Timothy Gavin

County where offense occurred : Wayne and elsewhere

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ ☐ Information --- no prior complaint.  
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: \_\_\_\_\_]  
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

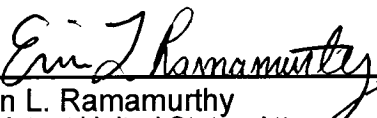
Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

April 28, 2022  
Date

  
 Erin L. Ramamurthy  
 Assistant United States Attorney  
 211 W. Fort Street, Suite 2001  
 Detroit, MI 48226-3277  
 Phone: 313-226-9788  
 Fax: 313-226-2372  
 E-Mail address: erin.ramamurthy@usdoj.gov  
 Attorney Bar #: P81645

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.